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September 24, 2003

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W
Washington, D.C 20554

**Re: *In the Matter of Qwest Communications International, Inc. Application
for Authority to Provide In-Region, InterLATA Services in Arizona;
WC Docket No. 03-194***

Dear Ms Dortch

MCI hereby comments on Qwest's application for long-distance authority in Arizona, the last state in its region for which Qwest seeks section 271 authorization. In MCI's experience, Qwest's OSS has been the most deficient in the country and has resulted in reject rates higher than in any other BOC region. Since entering the local market in the Qwest region, MCI has had to engage in lengthy trial-and-error processes that required MCI to expend significant resources in deciphering Qwest's poor documentation and non-standard OSS. Through these efforts MCI's reject level in the Qwest region has been reduced to 29% (as of the week of September 15, 2003) for residential customers, down from the 50% reject rate that existed several months ago during the Minnesota section 271 proceeding. Nevertheless, a 29% reject rate is too high and remains higher than any other BOC region of the country.

The primary reasons for these reject rates relate to Qwest's requirement that CLECs provide a full-service address on maintenance orders, and Qwest's requirement that CLECs include the correct customer code on orders, which is a Qwest code that changes after CLECs submit their initial migration orders. MCI will not repeat here its arguments associated with these issues, which we have explained in prior Qwest section 271 proceedings.

Instead we identify important deficiencies in Qwest's change management plan that Qwest has refused to correct in recent weeks. Specifically, Qwest's change management document lacks sufficient language to require that Qwest correct software defects within a specific timeframe. Without such language, CLECs have no guarantees that software defects will be fixed in a timely manner. MCI initiated a change request in April 2003 seeking a requirement that Qwest provide these timeframes. All CLECs voted in favor of this request, but because the Qwest change management plan requires a unanimous vote in order for a request to

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be approved, Qwest's vote against it resulted in the change request not passing.

In addition, AT&T initiated a change request seeking a log of all system defects, which would allow CLECs to track defects in a single document. All BOCs except Qwest provide such a log, which allows CLECs to understand what problems have occurred as part of a software release, when those problems will be corrected, and how CLECs are impacted. Such a document allows the tracking of corrections to problems and allows CLECs to anticipate customer problems. Qwest's response has been that each CLEC should just compile piecemeal the "Event Notifications" published by Qwest. But this would be a tedious effort that could easily result in inaccuracies. More importantly, without a log of defects with definitive fix dates, CLECs will be unable to plan their own systems corrections or understand what order types will fail until those defects are resolved. Nevertheless, Qwest denied this change request.

We urge the Commission to require Qwest to provide CLECs with timeframes for fixing software defects so that CLECs have some assurance that they will be fixed, and a defect log so that CLECs can easily track outstanding defects.

If you have any questions about this matter, please do not hesitate to contact me

Sincerely,

A handwritten signature in black ink, appearing to read "Lori Wright", written in a cursive style.

Lori Wright
202-736-6468

cc Aaron Goldberger
 Ryan Harsch
 Maureen Scott
 Janice Myles
 Gary Remondino